

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Case No: 1:23-md-03076-KMM**

In Re: FTX Cryptocurrency Exchange
Collapse Litigation

THIS DOCUMENT RELATED TO:

ALL ACTIONS

MOTION TO WITHDRAW AS COUNSEL

Pursuant to Local Rule 11.1(d)(3)(A), Michael A. Pineiro, Esq. and Jeffrey Marcus, Esq., hereby move to withdraw as counsel for Defendants Kevin O’Leary and Solomid Corporation (collectively, “Defendants”). In support thereof, undersigned counsel state:

1. Michael Pineiro and Jeffrey Marcus, who previously worked at the law firm Marcus Neiman Rashbaum & Pineiro LLP, represented the Defendants as counsel of record in connection with that law firm’s representation of the Defendants.

2. On August 2025, Mssrs. Pineiro and Marcus began working at another law firm—Marcus Rashbaum Pineiro & Meyers LLP. The Defendants engaged a new law firm—Neiman Mays Floch Almeida PLLC (NMFA)—to represent them in this matter. Jeffrey Neiman and Brandon Floch of NMFA continue to serve as counsel of record for Defendants.

3. As a result, undersigned counsel request that the Court enter an order authorizing Mssrs. Pineiro and Marcus to withdraw from this matter, removing them as counsel of record for these Defendants, relieving them of any further responsibilities, and removing them from the distribution of CM/ECF notifications in this matter. This motion is not opposed by the Defendants.

Date: December 8, 2025

Respectfully submitted,

**MARCUS RASHBAUM PINEIRO
& MEYERS LLP**

By: /s/ Michael A. Pineiro

Michael A. Pineiro

Fla. Bar No. 41897

mpineiro@mrpfirm.com

Telephone: (305) 400-4268

/s/ Jeffrey E. Marcus

Florida Bar No.

jmarcus@mrpfirm.com

Telephone: (305) 400-4262

2 South Biscayne Boulevard, Suite 2530

Miami, Florida 33131